Southern Nuclear

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC Item 2.2.01.11a.iii [Index Number 116]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.11a.iii [Index Number 116] to verify that the motor-operated valves identified in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) perform an active safety-related function to change position as indicated in Attachment A under pre-operational test conditions. The closure process for this ITAAC is based on the guidance described in NEI 08-01, “Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52”, which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.01.11a.iii [Index Number 116]

JMC/PCM/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0401
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.01.11a.iii [Index Number 116]

ITAAC Statement

Design Commitment

11.a) The motor-operated and check valves identified in Table 2.2.1-1 perform an active safety-related function to change position as indicated in the table.

Inspections/Tests/Analyses

iii) Tests of the motor-operated valves will be performed under preoperational flow, differential pressure, and temperature conditions.

Acceptance Criteria

iii) Each motor-operated valve changes position as indicated in Table 2.2.1-1 under pre-operational test conditions.

ITAAC Determination Basis

Multiple ITAAC are performed to verify that the motor-operated and check valves identified in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) perform an active safety-related function to change position as indicated in Attachment A. The subject ITAAC verifies testing of the motor-operated valves (MOVs) under preoperational flow, differential pressure, and temperature conditions.

Testing was performed in accordance with Unit 4 preoperational test procedures, component test work packages and Initial Test Program (ITP) work orders listed in SV4-CNS-ITR-800116 (Reference 1), SV4-CNS-ITR-801116 (Reference 2), and SV4-CNS-ITR-802116 (Reference 3) to verify that the motor-operated valves identified in Attachment A perform an active safety-related function to change position as indicated in Attachment A. Testing was performed on the MOVs under pre-operational flow, differential pressure, and temperature conditions and each MOV was verified to change positions as indicated in Attachment A.

The preoperational test procedure and ITP work order in reference 1 confirmed that each of the Spent Fuel Pool Cooling System (SFS) MOVs listed in Attachment A can be closed under preoperational flow, differential pressure, and temperature conditions. The SFS was aligned to take a suction from the refueling cavity and discharge back to the refueling cavity. The SFS valves listed in Attachment A were verified to be open, an SFS pump was placed in service recirculating the refueling cavity, SFS-PL-V034 was placed in local control, and a Refueling Cavity Isolation (RFCI) signal was generated to close the SFS valves in Attachment A. SFS-PL-V035 and SFS-PL-V038 were verified to close locally and in the Main Control Room (MCR) and the SFS pump was verified to trip on low flow. SFS-PL-V034 was returned to remote control and SFS-PL-V035 was placed in local control. The SFS valves in Attachment A were verified open, an SFS pump was placed in service recirculating the refueling cavity and the RFCI signal was generated again causing the SFS valves to close. SFS-PL-V034 was verified to close locally and in the MCR. The results of the Unit 4 tests are documented in Reference 1.

The component test work packages in reference 2 confirmed that each of the Unit 4 Component Cooling Water System (CCS) MOVs listed in Attachment A can be closed under preoperational flow, differential pressure, and temperature conditions. The CCS system was aligned with normal flow to and from containment with the A and B CCS pumps in service. The CCS MOVs in Attachment A were closed one at a time, verified to be closed by MCR indication and locally and then reopened to reestablish system flow. The results of the Unit 4 tests are documented in Reference 2.

The component test work packages in Reference 3 confirmed that each of the Containment Air Filtration System (VFS) MOVs listed in Attachment A can be closed and opened under preoperational flow, differential pressure, and temperature conditions. The VFS was in a normal system alignment and each of the MOVs listed in Attachment A were operated to the open position, verified locally and in the MCR and then operated to the closed position and verified locally and in the MCR. The results of the Unit 4 tests are documented in Reference 3.

References 1 through 3 confirm that each motor-operated valve changes position as indicated in Attachment A under pre-operational test conditions. References 1 through 3 are available for NRC inspection as part of the ITAAC 2.2.01.11a.iii Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.01.11a.iii Completion Package (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.01.11a.iii was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-CNS-ITR-800116, Rev. 0, “Unit 4 Recorded Results of SFS Motor-Operated Valves Change Position as Indicated in Table 2.2.1-1: ITAAC 2.2.01.11a.iii NRC Index Number: 116”
2. SV4-CNS-ITR-801116, Rev. 0, “Unit 4 Recorded Results of CCS Motor-Operated Valves Change Position as Indicated in Table 2.2.1-1: ITAAC 2.2.01.11a.iii NRC Index Number: 116”
3. SV4-CNS-ITR-802116, Rev. 0, “Unit 4 Recorded Results of VFS Motor-Operated Valves Change Position as Indicated in Table 2.2.1-1: ITAAC 2.2.01.11a.iii NRC Index Number: 116”
4. 2.2.01.11a.iiii-U4-CP-Rev0, “Completion Package for Unit 4 ITAAC 2.2.01.11a.iiii [Index Number 116]”

Attachment A

***Excerpt from COL Appendix C Table 2.2.1-1**

***Equipment Name**	***Tag No.**	***Active Function**
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	Transfer Closed
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	Transfer Closed
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	Transfer Closed
SFS Discharge Line Containment Isolation MOV - ORC	SFS-PL-V038	Transfer Closed
SFS Suction Line Containment Isolation MOV - IRC	SFS-PL-V034	Transfer Closed
SFS Suction Line Containment Isolation MOV - ORC	SFS-PL-V035	Transfer Closed
Vacuum Relief Containment Isolation A MOV - ORC	VFS-PL-V800A	Transfer Closed/ Transfer Open
Vacuum Relief Containment Isolation B MOV - ORC	VFS-PL-V800B	Transfer Closed/ Transfer Open